



P.O. Box 4324; Houston, TX 77210-4324

phone (713) 381-6500

www.enterpriseproducts.com

RECEIVED  
JAN 30 2019

January 28, 2019

*Federal Express*

Ms. Melanie Magee (6PD)  
Air Permit Engineer  
USEPA Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

**Subject: Draft Prevention of Significant Deterioration (PSD)  
Air Permit Application for the Sea Port Oil Terminal (SPOT) Project**

Dear Ms. Magee:

SPOT Terminal Services LLC (the Applicant), a subsidiary of Enterprise Products Operating LLC, a Texas limited liability company, is proposing to develop the Sea Port Oil Terminal (SPOT) Project in the Gulf of Mexico to provide U.S. crude oil loading services on very large crude carriers (VLCCs) and other crude oil carriers for export to the global market. During meetings on August 29, 2018, October 11, 2018, and November 26, 2018, SPOT Terminal Services LLC and the USEPA discussed the air permit application process, the status of development of the SPOT Project, and willingness of USEPA Region 6 to provide feedback to the Applicant via interim review of a draft of the air permit application. As a result, this draft PSD air permit application for the offshore portion of the SPOT Project is being submitted for your review.

The enclosed document describes an overview of the SPOT Project, its location, and air quality information. The project-specific air quality information (i.e., equipment specifications, emission rates, etc.) should be considered draft since the Applicant is continuing to advance the design process to develop detailed engineering and equipment specifications. However, this document contains details that more accurately reflect the proposed design and a best available control technology (BACT) analysis, including a greenhouse gas BACT. The potential emissions inventory, along with emission calculations, have been included. The Texas Commission of Environmental Quality (TCEQ) air permit application forms are also included; the forms contain current equipment information but are subject to change. As you are aware, the Applicant has requested the USEPA's approval for use of the AERMOD-COARE model for the ambient impact modeling analysis. The version of the draft air dispersion modeling protocol, as submitted to USEPA Region 6 on October 5, 2018, is included as Appendix I and an Air Quality Modeling Analysis Report based on subsequent discussions is included as Appendix J in this application.